



Region 2
3201 Spurgin Road
Missoula, MT 59804
September 24, 2020

Dear Interested Citizens:

Thank you for your thoughtful reviews and comments on a proposal by Montana Fish, Wildlife & Parks (FWP) to conduct forested habitat restoration treatments on approximately 100 acres of forest land on its Mount Jumbo Wildlife Management Area (MJWMA), northeast of Missoula in Missoula County. The objectives of the proposed treatments are to: 1) increase forage potential on elk and deer winter-range, 2) promote stand conditions that would allow fire to burn at low-severity appropriate for the habitat type, and 3) reduce fuel loading in the wildland urban interface.

Treatments would involve removal of conifer trees (both merchantable and submerchantable) through a combination of mechanical and non-mechanical treatments. FWP is coordinating this project with the Missoula Ranger District of the Lolo National Forest, which is implementing similar treatments on its ongoing Marshall Woods Project on its nearby lands. Similar treatments are also being planned on adjacent City of Missoula land. The proposed treatments on the MJWMA compliment those projects by helping reduce hazardous fuels at a larger scale, as well as increasing forage potential on deer and elk winter-range. The project purpose is to improve wildlife habitat; this project would not be proposed if not for a need to conserve and improve wildlife habitat on the WMA.

Enclosed is a decision document in which I explain my rationale for recommending that the Fish and Wildlife Commission (Commission) approve the habitat restoration treatments on the MJWMA, as proposed and described in the draft environmental assessment (EA) under the preferred action (Alternative B). Upon completion of the public involvement process and by inclusion of information noted in the Decision Notice, FWP accepts the draft EA as final. The decision document also includes all public comment received during the public review period.

FWP expects to request approval for this proposal at the regularly scheduled Commission meeting on October 22, 2020. This meeting is open to the public as are other Commission meetings, and it is expected to be a "virtual meeting" via Zoom. (A few days prior to the meeting, please see FWP's webpage <http://fwp.mt.gov/default.html> ["Commission"]) for the agenda schedule and details on how to watch and/or participate.)

Please feel free to contact me at 406-542-5500 with any questions you may have. Thank you for your interest and participation.

Sincerely,

Randy Arnold
Regional Supervisor

RA:sr



DECISION NOTICE: Mount Jumbo Wildlife Management Area Forest Habitat Restoration Project

Montana Fish, Wildlife & Parks
Region 2
3201 Spurgin Road, Missoula MT 59804
Phone 406-542-5500

September 2020

DESCRIPTION OF PROPOSED ACTION

Montana Fish, Wildlife & Parks (FWP) proposes to conduct forested habitat restoration treatments on approximately 100 acres of forest land on its Mount Jumbo Wildlife Management Area (MJWMA), northeast of Missoula in Missoula County. If approved by the Montana Fish and Wildlife Commission, the work could begin as early as October 23, 2020.

The objectives of the proposed treatments are to:

1. Increase forage potential on elk and deer winter range,
2. promote stand conditions that would allow fire to burn at low-severity appropriate for the habitat type, and
3. reduce fuel loading in the wildland urban interface.

The treatments would involve the removal of conifer trees (both merchantable and submerchantable) through a combination of mechanical and non-mechanical treatments. FWP is coordinating this project with the Missoula Ranger District of the Lolo National Forest (LNF), which is implementing similar treatments on its ongoing Marshall Woods Project on adjacent National Forest System Lands. Similar treatments are also being planned on adjacent City of Missoula land. The proposed treatments on the MJWMA compliment these projects by reducing hazardous fuels at a larger scale as well as increasing forage potential on deer and elk winter-range. The purpose of this project is to improve wildlife habitat; this project would not be proposed if not for a need to conserve and improve wildlife habitat on the WMA.

Following this action, FWP anticipates that important ungulate winter-range condition would improve due to increased grass and woody-browse understory recruitment. Treatment would also reduce the susceptibility of the treated area to high-intensity stand-replacement fire that would kill large overstory trees, damage thin organic soils, slow grass and woody browse recruitment, and pose a risk to neighboring landowners.

Costs to FWP for these forest habitat restoration treatments are expected to be partially offset by the sale of merchantable timber byproduct. FWP's appraisal of timber values, logging costs, and follow-up treatments resulted in an estimated cost of \$50,000. The actual cost will depend on the value of logs at the time of contract advertisement and other factors that vary over time. FWP would also pursue grant funding through various sources.

ALTERNATIVES

Alternative A: No Action. If FWP decides not to proceed with the proposed action, forest habitat restoration treatments on the Mount Jumbo WMA would not occur at this time. Elk and deer winter-range would continue to experience forest succession, which would trend towards increasing forest canopy coverage, stressing water resources and shading out important grasses and deciduous vegetation. Hazardous fuels would continue to build up in the wildland urban interface (WUI), which would increase the susceptibility of the forest to stand-replacement fire. There would be a decreased probability of recruiting/ maintaining a mature overstory as competition for limited resources (sunlight, water and nutrients) increases through time and the overstory trees become more susceptible to succumbing to drought stress, bark beetles and/or crown fire. Potential of increasing habitat diversity would be limited and may decrease without promotion of a mature overstory.

Alternative B: Proposed Action. Conduct forested habitat improvement treatments on approximately 100 acres of the Mount Jumbo WMA. Following this action, FWP anticipates that important ungulate winter range condition would improve due to increased grass and woody-browse recruitment. Habitat diversity would be expected to increase at the stand level and across the larger landscape, providing habitat niches for a wide range of game and nongame wildlife. Hazardous fuels in the WUI would be reduced, decreasing the susceptibility of the proposed treatment units to stand-replacement fire.

PUBLIC REVIEW PROCESS

Montana Fish, Wildlife & Parks is required by the Montana Environmental Policy Act (MEPA) to assess potential impacts of its proposed actions to the human and physical environments, evaluate those impacts through an interdisciplinary approach, including public input, and to make a decision based on this information. FWP released a draft environmental assessment (EA) for public review of this proposal (Mount Jumbo Wildlife Management Area Forest Habitat Restoration Project) on July 24 and accepted public comment for a minimum of 30 days until August 25, 2020.

Legal notice of the MJWMA Forest Habitat Restoration Project Draft EA was published once each in the *Independent Record* (Helena, July 24) and *Missoulian* (July 24) newspapers. A statewide News Release was prepared and distributed August 13, 2020 to a standard list of media outlets interested in FWP issues.

FWP mailed 7 copies of the EA and approximately 67 email notifications of the EA's availability to adjacent landowners and interested individuals, groups and agencies. The EA was available for public review on FWP's web site (<http://fwp.mt.gov>, "Public Notices") from July 24 through August 25, 2020. Comments could be made on the EA's webpage or submitted by mail or email to Region 2 FWP.

PUBLIC COMMENT

Summary of Public Comment

FWP received 8 comments during the public review period, 4 from individuals and 4 from agencies/ organizations including the City of Missoula Parks & Recreation Department, Hellgate Hunters and Anglers (Missoula), Missoula Ranger District (Lolo National Forest), and Montana Wildlife Federation (Helena). See the Appendix for all comments received. Individuals making comment included 3 from Missoula and one did not indicate their location.

All 8 commenters supported the proposed action, and no commenters were in opposition. Comments received in support of the proposed action included [numbers in brackets refer to the Commenter # in the Appendix]:

- “. . . excellent project that will both improve habitat for elk and reduce crown fire potential.” [1]

- “Your public engagement process is well-crafted. Continue to make it clear that habitat improvement is the over-riding objective and that all treatments are in service of this goal.” [2.3]
- “I applaud FWP for the frugality, efficiency, and fiscal responsibility of citizen's tax dollars.” [3.1]
- “Your coordination with the US Forest Service, City of Missoula and others in this all lands approach exemplifies the National Cohesive Wildland Fire Strategy goal of managing for resilient landscapes across all jurisdictions.” [4.4]
- “Overall, this EA addresses many concerns that we would potentially have regarding noxious weed proliferation, logging practices and project timing.” [5.3]
- “As an adjacent landowner to the proposed project, we are excited to see any project which will improve habitat for elk and other wildlife species that depend on the forests and grasslands of Mt. Jumbo.” [6.1]
- “For sportsmen and women, homeowners, and the broader Missoula community, this restoration project is a commonsense approach to a pressing issue.” [7.2]
- “I also support the burning of slash . . . , as well as broadcast burning . . . it’s sometimes necessary to improve or maintain beneficial conditions, and is a good trade-off for reduced fuel loads and risk of an uncontrolled wildfire . . .” [8.3]

Response to Public Comment

The following summarized comments encompass specific issues, questions or suggestions received during the public comment period, along with FWP’s responses.

Comment A: Please leave or protect all existing snags possible. [1, 2.4]

FWP Response: Retaining snags, trees with visible nesting cavities, and trees with dead/ deformed tops will be incorporated into FWP’s tree marking guidelines and contract specifications. The only scenario in which these trees would be felled is if they pose a safety hazard to the operators/personnel conducting the treatment activities (e.g., equipment operators, thinning crews, prescribed burning crews, etc.). FWP would generally remove the area around these hazard trees from the treatment unit in order to mitigate the hazard as well as reducing the potential for these trees to be felled. If these trees were felled for safety reasons, FWP would require that they be left on the ground as large woody-debris habitat.

Comment B: Would potential for stand-replacing fire due to accumulations of hazardous fuels be considered a threat to the habitat types? [3.2]

FWP Response: *Montana’s State Wildlife Action Plan*¹ recognizes uncharacteristically high tree densities as a threat to certain forested habitats such as those found on the MJWMA. In turn, FWP also recognizes that these high tree-densities have the potential to increase the susceptibility of the forest to uncharacteristic stand-replacement fire. As stated in the EA, FWP anticipates that by implementing the Proposed Action, the potential threat of decades-long habitat loss due to uncharacteristic stand-replacement would be lessened.

Comment C: Instead of just benefitting the timber industry, would it be appropriate to outline benefit to multiple industries from both long-term increased public use opportunities by improving the vitality of the land and the result of cleaner airshed in the event of a fire in the WMA? [3.3]

FWP Response: While FWP does expect the implementation of the Proposed Action to have substantial and prolonged positive impacts to the human and physical environment, FWP did

¹ Montana’s State Wildlife Action Plan. 2015. Montana Fish, Wildlife & Parks, 1420 East Sixth Avenue, Helena, MT 59620. 441 pp.

not conduct a detailed analysis of the secondary and cumulative effects that this proposed action would have on multiple industries. This is mainly due to the relatively small size of the project and the challenges that poses to measuring a potentially positive significant impact.

Comment D: Due to the low amount of volume (board feet) being harvested and the high amount of public use in the area, it may make sense to physically mark "cut" trees of harvestable size, in the harvesting units to further mitigate long-term aesthetic concerns. [3.4]

FWP Response: As stated in the EA, FWP would designate trees for removal (via "cut-tree marking") based on the stand prescription by marking with tree paint and by contract specifications. FWP is currently planning to cut-tree mark the merchantable trees (greater than 5 inches DBH [diameter at breast height]) for the timber harvesting phase. For the precommercial thinning phase, submerchantable trees (less than 5 inches DBH) would be cut by description based on contract specifications and under close supervision by the FWP Forester and other staff.

Comment E: Please clarify whether you intend to access the WMA during the Mt. Jumbo Winter Wildlife closure extending from December 1st through May 1st. If at all possible, we recommend that no work occurs during the usual winter closure period. [6.2, 6.3]

FWP Response: FWP may potentially access the MJWMA during the winter wildlife closure (December 1--May 1) for the following activities: timber harvesting, slashing logging-damaged submerchantable trees, grass seeding, skid trail rehab, clearing trails, precommercial thinning, slash pile burning, slash pile rehab, fireline construction, prescribed burning, fireline rehab, and/or weed treatments. While FWP anticipates that it is unlikely that all of this work would occur during the winter wildlife closure, FWP estimates that over the duration of the project, there is the potential for activity to occur for up to 41 days during the 5-month winter wildlife closure.

The operating period allowed for the timber harvesting operation is from October 23, 2020 to March 1, 2021. This operating period coincides with the Missoula Ranger District's (MRD) operating period for timber harvesting on National Forest System Lands immediately east of the MJWMA. The operating period for timber harvesting also requires that the harvesting occur only during periods of relatively dry, frozen, or snow-covered conditions to prevent damage to soils. In order to avoid separate entries, FWP would prefer that its activity occur simultaneously with the MRD's timber harvesting operation to reduce the overall duration of impacts to recreationists and also for economic reasons. Slashing logging-damaged submerchantable trees, skid trail rehab, and trail clearing activities may also occur concurrently with the timber harvesting operation or in the early spring (before May 1). These follow-up treatments would ensure that hiking trails are not obstructed by logging debris or leaning trees. FWP estimates the duration of the timber harvesting phase and associated follow-up activities to be up to 13 days.

Grass seeding as part of the skid-trail rehab, pile-burning rehab, and fireline rehab would preferably occur in the fall prior to December 1; however, there is the potential that it could occur in the early spring (before May 1) if conditions were not suitable for grass seeding in the fall. Fireline construction, prescribed burning, and fireline rehab may also occur in the early spring. Prescribed burning would need to meet the weather and fuels conditions prescribed in a burn plan, but it is possible that the burning conditions would occur in the early spring (before May 1). Overall, FWP estimates these activities could occur for a duration of up to 28 days.

FWP would specify in its contracts that precommercial thinning be conducted from July 15 through December 1; however, there is a possibility that some associated activity would occur during the winter wildlife closure. However, that activity is expected to be minimal and short duration.

Comment F: If not possible [to avoid forestry activities during the December 1—May 1 Mt. Jumbo closure period], what specific impacts do you expect logging operations to have on elk while they are in their winter range? [6.4]

FWP Response: FWP anticipates that during forestry operations the majority of elk would use the winter range on City lands south of Mount Jumbo saddle and around Mount Jumbo itself (South Zone). The South Zone opens to public use on March 15, while the North Zone, which includes MJWMA, opens on May 1. MJWMA and surrounding lands in the North Zone become most important for elk during this transition period in spring when elk get bumped out of the South Zone when it opens. Elk linger in the North Zone until green-up proceeds to higher elevations, the timing of which depends on annual conditions. Therefore, any spring treatments (especially burning) will take annual conditions into account to mitigate any displacement of elk during this period. However, any short-term displacement should be countered by the long-term benefits of habitat improvement for elk. FWP has conducted recent logging operations on elk winter range on the Blackfoot-Clearwater WMA (2018-19) and West Kootenai WMA (2017-18) during winter months, and anecdotal evidence suggests that elk were only displaced during these projects from the immediate area in which the activity was occurring--however, the elk were attracted to feeding on the newly available tree tops and moss at night in the treatment area.

Comment G: Finally, we wish to reiterate our request that FWP and their contractors coordinate any access across City land with the Missoula Parks Department. [6.5]

FWP Response: FWP understands and would comply with terms set forth in agreements between FWP and the City of Missoula for activities occurring on and across City Lands.

DECISION

Based upon the EA and the applicable laws, regulations, and policies, I have determined that the proposed action will not have negative effects on the human and physical environments associated with this project. Therefore, I conclude that the EA is the appropriate level of analysis, and the preparation of an Environmental Impact Statement is unnecessary.

Formal comments on the EA submitted to FWP were supportive and none opposed the project. The proposal was well publicized. No concerns were raised that would bring the environmental analysis into question. By notification of this Decision Notice, the draft EA and this Decision Notice (the information discussed in) are hereby made the final EA.

Based on the analysis in the draft EA and the public comment received, I have selected the “Proposed Action” (Alternative B). I will recommend to the Fish & Wildlife Commission that it approves the Mount Jumbo WMA Forest Habitat Restoration Project, as described in the EA. This is expected to occur at the Commission’s next regularly scheduled meeting on October 22, 2020. (This meeting is expected to be a “virtual meeting” held via Zoom. A few days prior to the meeting, please see FWP’s webpage <http://fwp.mt.gov/default.html> [“Commission”]) for the schedule and details on how to watch and/or participate.)



Randy Arnold
Region 2 Supervisor
Montana Fish, Wildlife & Parks

9/24/2020
Date

APPENDIX. Comments on the proposed forested habitat restoration project on Mount Jumbo Wildlife Management Area and its Draft EA, received by FWP during the comment period July 24 through August 25, 2020. Comments received via E = email, M = mail.

Com- men- ter #	Via	Para- graph	Comment
1	E		This is an excellent project that will both improve habitat for elk and reduce crown fire potential. Retention of snags is mentioned and I want to emphasize the importance of leaving snags and a few large diameter trees that could become snags. Flammulated owls do occur in this area. Leaving snags for this species of conservation concern and other snag dependent birds should be considered as an important objective. Creating a more open forest condition may also improve foraging conditions for the owl.
2	E	1	I have hiked through and around the Mt Jumbo WMA many times, and I believe the proposed forest habitat restoration project is appropriate and necessary.
		2	A long history of fire suppression and economic-driven selective harvest have created non-sustainable forest conditions. Despite this history, there does remain a good legacy of large trees on the site which need the protection that can occur with designed thin-from-below treatment
		3	Your public engagement process is well-crafted. Continue to make it clear that habitat improvement is the over-riding objective and that all treatments are in service of this goal.
		4	Given the lack of snags in the Mt Jumbo area, please protect all existing snags possible. I believe this treatment will improve prospects for future snag recruitment.
		5	The current outbreak of tussock moth on parts of Mt Jumbo are in part a reflection of the overly dense condition in these areas. Although a native insect, large tussock moth outbreaks can indicate forest conditions out of balance.
		6	Thank you for vigorously pursuing this restoration activity.
3	E	1	<ul style="list-style-type: none"> • Mentioned in Part 1, Item 8 of the EA, the "FWP is planning to coordinate the logging portion of this project with the adjacent timber harvest on Forest Service Land..." I applaud FWP for the frugality, efficiency, and fiscal responsibility of citizen's tax dollars.
		2	<ul style="list-style-type: none"> • In part 1, Item 2, addressing Montana's State Wildlife Action Plan and threats to habitat types in the WMA, would potential for stand-replacing fire due to accumulations of hazardous fuels be considered a threat to the habitat types?
		3	<ul style="list-style-type: none"> • Part 2, Item 8, outlining benefits of forest restoration treatments, instead of just benefitting the timber industry, would it be appropriate to outline benefit to multiple industries from both long-term increased public use opportunities by improving the vitality of the land and the result of cleaner airshed in the event of a fire in the WMA?
		4	<ul style="list-style-type: none"> • If there are any growing concerns of aesthetic value deterioration: Due to the low amount of volume (board feet) being harvested and the high amount of public use in the area, it may make sense to physically mark "cut" trees of harvestable size, in the harvesting units to further mitigate long-term aesthetic concerns.
		5	<ul style="list-style-type: none"> • I am in full support of this project and am encouraged to see a project right out my backdoor that will ensure forest resilience and vitality as well as contribute to long-term public safety, health, and economic stability.
4	M	1	The Missoula Ranger District of the Lolo National Forest supports the objectives of the proposed treatments for the Forest Habitat Restoration Project listed in the July 2020 Draft Environmental Assessment.
		2	The objectives of the proposed treatments to increase forage potential on elk and deer winter range, promote stand conditions that would allow fires to burn at low severity appropriate for the habitat type, and reduce fuel loading in the wildland urban interface closely align with similar ongoing treatments in the Missoula Ranger District's Marshall Woods Ecosystem Restoration Project (2016) adjacent to your proposed project boundary. These congruent treatments would serve to increase the efficacy of reducing the fuels and lessening the wildfire hazard in the broader area.

		3	Promoting ecosystem health with prescribed fire to distribute beneficial fire effects to areas within the wildland urban interface (WUI) is an essential tool we support and compliments the objectives of the 2018 Missoula County Wildfire Protection Plan (CWPP).
		4	Your coordination with the US Forest Service, City of Missoula and others in this all lands approach exemplifies the National Cohesive Wildland Fire Strategy goal of managing for resilient landscapes across all jurisdictions.
		5	Thank you for providing the opportunity for Missoula Ranger District to comment on this proposal. Missoula Ranger District is interested in following the progress of your analysis and alternatives development and we look forward to this collaboration.
5	E	0	Please consider the attached document as the Montana Wildlife Federation's comments regarding the Mt Jumbo WMA Forest Habitat Restoration Project Draft EA. Will you please also list me as the point of contact for future updates?
		1	The Montana Wildlife Federation (MWF) is our state's oldest and largest state-based wildlife conservation organization. We were formed in 1936 when hunters joined landowners to restore depleted wildlife in Montana, and for 84 years we have worked on key issues affecting wildlife, habitat and access.
		2	MWF is strongly supportive of the proposed forest habitat restoration project of approximately 100 acres on the Mt. Jumbo Wildlife Management Area (WMA). This project will increase potential forage for elk and deer as well as reduce severe wildfire risk in the wildland urban interface (WUI) near Missoula. Additionally, many species of non-game wildlife will benefit from this proposed habitat work.
		3	Overall, this EA addresses many concerns that we would potentially have regarding noxious weed proliferation, logging practices and project timing. Conducting project work during winter months reduces negative impacts to soil health and leaves minimal landscape impact. The elk herd that frequents Mt Jumbo WMA typically utilizes the project area during late winter and early spring so the timing of project work mitigates negative impacts to this herd. Through coordinating this work with local Forest Service (FS) projects, there will be minimal long-term negative impacts to wildlife and recreation in this WMA. While it is impossible to completely negate detrimental impacts, we believe this project does an excellent job of walking the line between achieving landscape goals and reducing harm to wildlife.
		4	MWF commends the Department of Fish, Wildlife & Parks for working to improve wildlife habitat on our WMA's while moving towards a fire resilient landscape. Thank you for the opportunity to comment If you have any questions, or if we can be of any assistance, please contact our Western Montana Field Coordinator, Eric Clewis, at eclewis@mtwf.org
6	E	0	Please find attached, the City of Missoula's Conservation Lands Program comments on the Draft EA for Mt. Jumbo. Thanks for the opportunity to comment. Please let us know if you have any questions or seek additional information.
		1	Thank you for the opportunity to read and comment on the draft Environmental Assessment for the Mt. Jumbo Wildlife Management Area. As an adjacent landowner to the proposed project, we are excited to see any project which will improve habitat for elk and other wildlife species that depend on the forests and grasslands of Mt. Jumbo. We see the Mt. Jumbo Wildlife Management Area as critically important in supporting the broader commitments that the City and FWP have jointly made to provide quality winter range habitat for elk and other species. With this in mind, we offer the following comments and/or recommendations to the Draft EA as written:
		2	➤ Please clarify whether you intend to access the WMA during the Mt. Jumbo Winter Wildlife closure extending from December 1 st through May 1 st .
		3	➤ If at all possible, we recommend that no work occurs during the usual winter closure period.
		4	➤ If not possible, what specific impacts do you expect logging operations to have on elk while they are in their winter range?
		5	➤ Finally, we wish to reiterate our request that FWP and their contractors coordinate any access across City land with the Missoula Parks Department.
		6	Thanks again for the opportunity to comment. We look forward to continuing to improve habitat on Mt. Jumbo.
7	E	0	Attached are Hellgate Hunters & Anglers' comments supporting the Jumbo restoration project. Thanks for the opportunity to comment!

		1	Hellgate Hunters and Anglers (HHA) is an all-volunteer conservation organization based in Missoula. We work to conserve Montana's wildlife, wild places, and fair-chase hunting and fishing heritage. We represent over 400 members and supporters in western Montana. On behalf of these members, I write to you today to voice support for the Mt Jumbo Wildlife Management Area Forest Habitat Restoration Project.
		2	The proposed actions will increase elk and deer forage across roughly 100 acres in addition to improving habitat for many non-game wildlife species. This project will also reduce wildfire risk near many houses within the north end of the Missoula valley. For sportsmen and women, homeowners, and the broader Missoula community, this restoration project is a commonsense approach to a pressing issue.
		3	The environmental assessment directly addresses prevention measures for the spread of noxious weeds and provides mitigation for damage caused by logging practices. Scheduling this project during winter months will reduce the impacts of heavy machinery on the landscape. Additionally, coordinating this work with local USFS efforts will achieve project results over a shorter time period, thereby reducing negative impacts to wildlife and recreation. The elk herd that frequents this WMA typically occupies the project area in late winter and early spring and should not be significantly negatively impacted by this project. We appreciate the concern paid to Missoula's most visible elk herd in this regard and encourage the Department to ensure that the work is completed before elk occupy this winter range.
		4	Hellgate Hunters & Anglers commends Montana FWP for working to improve wildlife habitat on our wildlife management areas while moving towards a fire resilient landscape. Thank you for the opportunity to comment.
8	E	1	As a resident on Elk Ridge Road, the project area is located about a mile from our house. Our family has recreated in the area of the Mount Jumbo WMA for years, hiking and biking the roads and trails. I believe the proposed project can be conducted with minimal disruption to recreation, and fuel reduction efforts will reduce the risk of severe wildfire and help protect recreation values in the long run.
		2	As a professional forester, I support the vegetative treatments proposed to enhance wildlife habitat, improve growth and vigor of remaining trees, and reduce hazardous fuel loading. Merchantable sized trees (sawlogs and pulplogs) designated for removal should be utilized and hauled offsite to reduce fuels and support local jobs.
		3	I also support the burning of slash associated with the thinning operations, as well as broadcast burning prescribed by FWP to improved habitat. Nobody likes the smoke generated by such burning, but it's sometimes necessary to improve or maintain beneficial conditions, and is a good trade-off for reduced fuel loads and risk of an uncontrolled wildfire, literally in my back yard.
		4	I am encouraged to see FWP plans to minimize impacts from the thinning operations by using forestry Best Management Practices. I support the application of herbicides as necessary to control noxious weeds on the project area, as weeds are a huge threat to native grasses and forbs in the area on which deer and elk depend.
		5	Like so many others in the Missoula Valley, our family has enjoyed watching elk on the slopes of Mount Jumbo and the surrounding area. It's great to see FWP actively managing the Mount Jumbo WMA to preserve and enhance wildlife habitat and other values.